UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO,
WESTERN DIVISION

George Price, et al.,	)	Case No. 3:15-cv-632
and	)	
Arthur R. Bell, et al.,	)	Case No. 3:15cv1175
and	)	
Frederick Hofer, Jr.,	)	Case No. 3:16cv469
and	)	Case No. 3:15cv2698
Terrence J. Miller,	)	
and	)	Case No. 3:16cv139
James O. Combs,	)	
and	)	Case No. 3:16cv789
Edward Stroub,	)	
and	)	Case No. 3:16cv2591
Arron Miller,	)	
Plaintiffs,	)	
v.	)	
MANAGEMENT & TRAINING CORP., et al.,	)	**DEFENDANTS' STATUS REPORT**
Defendants.	)	

Now comes Defendants MTC and MTC Medical LLC by and through counsel and hereby submits its Status Report in advance of the May 11, 2017, telephone conference for the above referenced case numbers. The Court requested that the parties consult with each other and submit a joint proposal for discovery schedule related to the respondeat superior discovery issues. The parties exchanged proposed discovery schedules and participated in a conference call to address proposed schedule. These communications and correspondence were unsuccessful; therefore, the parties agreed to submit separate discovery schedules. Accordingly, the Defendants submit the following respondeat superior schedule.

- Plaintiff to provide 30(b)(6) like notice of identifying the topics of inquiry for R/S discovery: June 1, 2017
- Defendants to provide identity of R/S witnesses: June 15, 2017
- Deadline for Depositions of R/S witnesses: October 15, 2017
- Plaintiff(s) to amend pleadings: November 1, 2017
- Plaintiff's Expert Reports: December 1, 2017
- Defendant's Expert Reports: February 1, 2018
- Deadline for Expert Depositions: March 1, 2018
- Dispositive Motions: April 1, 2018
- BIO/Reply Per court

- **Fact Discovery**
  - Fact discovery shall be ongoing
    - Fact written discovery: October 1, 2017
    - Fact depositions deadline: December 1, 2017

- Plaintiff's Expert Report: December 1, 2017
- Defendant's Expert Report:
  FEBRUARY 1, 2018
- Deadline for Liability/Medical
  Expert Depositions: March 1, 2018
- Dispositive Motions: April 1, 2018

  BIO/Reply Per court

In response to Defendants' discovery schedule, Plaintiff submitted their proposed schedule where they have identified a minimum of 94 depositions to be taken over the course of the next two (2) years with a trial schedule in 2020. Defendants' understanding from the Court was to identify witnesses that overlapped with regard to the issue of policy, custom and procedure for the medical indifference claims raised by Plaintiffs in the various lawsuits. This would provide guidance if these claims have merit or if they can proceed by amending their pleadings. Because the parties could not agree, we look forward to the Court's involvement at the telephone conference to assist in this matter.

Respectfully submitted,

/s/ Michael P. Quinlan
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CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing ***Defendants' Status Report*** was served by email this 8th day of May 2017, upon the following:

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